

EXHIBIT AAA



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VAWD

Read our August 9, 2018 **statement** (<https://nabp.pharmacy/nabps-verified-accredited-wholesale-distributors-vawd-program-protecting-the-prescription-drug-supply-chain/>) that addresses questions and misinformation regarding VAWD processes and standards. The statement also provides suggestions for how applicants can succeed in moving forward in the VAWD process and addresses the time it takes to earn accreditation.

VAWD: Contributing to a Safe Wholesale Distribution Supply Chain



The Verified-Accredited Wholesale Distributors® (VAWD®) accreditation is for facilities engaged in the act of wholesale drug distribution. To become VAWD-accredited and display the VAWD Seal, facilities must undergo a criteria compliance review, which includes: a rigorous review of their operating policies and procedures; licensure verification; a survey of a facility's operations; and screening through the **NABP Clearinghouse** (<http://nabp.pharmacy/member-services/nabp-clearinghouse/>).

VAWD accreditation plays a pivotal role in preventing counterfeit drugs from entering the United States (US) drug supply: it helps protect the public from drugs that have been contaminated, diverted, or counterfeited. The US supply of prescription drugs is produced and delivered to patients via a complex distribution path, and VAWD accreditation helps ensure that the wholesale distribution facility operates legitimately, is licensed in good standing, and is employing security and best practices for safely distributing prescription drugs from manufacturers to pharmacies and other institutions.

If you need a facility e-Profile ID, you will need to contact the VAWD accreditation program at VAWD@nabp.pharmacy (<mailto:VAWD@nabp.pharmacy>).

State-Specific Requirements

The state boards of pharmacy play an important role in regulating the drug supply chain. State laws and regulations that the boards develop help protect the public from receiving medications that have been contaminated or counterfeited.

Currently, 24 states recognize VAWD accreditation. Many of these states recognize VAWD as a means of implementing the licensing provisions of new laws, while mitigating the fiscal and operational impact on their board.

Of the 24 states that recognize VAWD, Indiana, Iowa, North Dakota, and Wyoming require VAWD accreditation as a component of licensure. For further information on state-specific licensing requirements, inquire with each of the states in which your facility conducts business.

Why Was VAWD Created?

In 2003, NABP convened a task force to aid in board efforts regarding counterfeit drugs and wholesale distributors. The task force recommended revisions to NABP's **Model Rules** (<http://nabp.pharmacy/publications-reports/resource-documents/model-pharmacy-act-rules/>) for the Licensure of Wholesale Distributors in order to make it difficult for illegitimate wholesalers to become licensed and transact business. The Model Rules are a subset of the *Model State Pharmacy Act and Model Rules of the National Association of Boards of Pharmacy*, a document on which many states model their state pharmacy practice acts and rules.

The task force also proposed the creation of an accreditation program (VAWD) and clearinghouse for wholesale distributors – a plan that was immediately supported by Food and Drug Administration – to further combat counterfeit drugs. VAWD was operational by 2004.

Contact Us

If you have any additional questions about VAWD, please email **VAWD@nabp.pharmacy** (**<mailto:VAWD@nabp.pharmacy>**).



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